

KARL S. HALL
Reno City Attorney
PETER K. KEEGAN
Deputy City Attorney
Nevada State Bar No. 12237
Post Office Box 1900
Reno, Nevada 89505
(775) 334-2050
Attorneys for the City of Reno

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ERICA BLUTH, an individual, and
LAVORIA WILSON, an individual,

Plaintiff,
vs.

TYLER BAEHR, and individual, and THE
CITY OF RENO, a political subdivision of
the State of Nevada,

Defendants.

CASE NO.: 3:25-cv-00129-ART-CSD

**OPPOSITION TO PLAINTIFFS'
MOTION REGARDING DISCOVERY
DISPUTE**

Defendant, the City of Reno ("the City"), by and through their attorneys, Reno City Attorney Karl S. Hall and Deputy City Attorney Peter Keegan, hereby submit the instant Opposition to Plaintiffs' Motion Regarding Discovery Dispute (ECF No. 17).

MEMORANDUM OF POINTS AND AUTHORITIES

I. The *Draft* RPD Internal Affairs Report, ADI 2024-00011, is Incomplete.

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii), the City timely identified the RPD *Draft* Internal Affairs Report, ADI 2024-00011, in its Initial Disclosures.¹ Counsel for the City identified the

¹ See (ECF No. 17-1- at 4 section B.).

1 RPD Internal Affairs Report, ADI 2024-00011, as a “*Draft*” because the report, ADI 2024-00011,
 2 is incomplete. Counsel for the City has been informed by RPD Internal Affairs that the report, ADI
 3 2024-00011, is expected to be completed in three weeks’ time.

4 **II. Certification of Meet and Confer Efforts**

5 The undersigned certifies that on May 2, 2025, at 2:00 p.m., a videoconference meet and
 6 confer was held between Plaintiffs’ counsels, Luke Busby and Lauren Gorman, and the City’s
 7 counsel, Peter Keegan. During the meet and confer, counsel for the City informed the Plaintiffs’
 8 counsels that the RPD’s Internal Affairs Report, ADI 2024-00011, would be made available upon
 9 completion. Dissatisfied, Plaintiffs’ counsel Busby requested to stop by Reno City Hall that
 10 afternoon with a flash drive and copy ADI 2024-00011 in its draft form. Counsel for the City
 11 refused the request and tried to reassure Plaintiffs’ counsels that the City’s description of the RPD’s
 12 Internal Affairs Report, ADI 2024-00011, as a “*Draft*” was a good faith attempt at technical
 13 compliance with the City’s discovery obligations. Apparently still dissatisfied, Plaintiffs’ counsels
 14 have resorted to filing the instant discovery dispute motion.

15 **II. City’s Requested Resolution**

16 The City requests three weeks’ time to allow for completion by RPD Internal Affairs of
 17 the Report, ADI 2024-00011, upon which time Plaintiffs will be provided a copy.

18 DATED this 8th day of May 2025.

19 KARL S. HALL
 20 Reno City Attorney

21
 22 By: /s/ Peter Keegan
 23 PETER K. KEEGAN
 24 Deputy City Attorney
 25 Nevada State Bar No. 12237
 26 Post Office Box 1900
 27 Reno, Nevada 89505
 28 *Attorneys for the City of Reno*

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the RENO CITY ATTORNEY'S OFFICE, and that on this day, I served a copy of on the **OPPOSITION TO PLAINTIFFS' MOTION FOR PROTECTIVE ORDER** on the party(s) set forth below by:

 X CMECF electronic service.

Electronically addressed as follows:

Luke Busby, Esq.
316 California Ave.
Reno, NV 89509
luke@lukeandrewbusbyltd.com
Attorney for Plaintiffs

Lauren Gorman, Esq.
275 Hill Street, Ste 248
Reno, NV 89501
lgorman@laurengormanlaw.com
Attorney for Plaintiffs

 X Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada, postage prepaid, following ordinary business practices, and addressed as follows:

Tyler Michael Baehr
9752 Pachuca Drive
Reno, NV 89521
In Propria Persona

DATED this 8th day of May 2025.

/s/ Peter Keegan

Peter Keegan
Deputy City Attorney